

29 September 1998

**MEMORANDUM** for U.S. Army Corps of Engineers, Buffalo District, **ATTN:**  
**Harrold Leggett**, 1776 Niagara Street, **Buffalo**, New York **14207-3 199**

**SUBJECT:** Response to Resume' of **Staff Visit** to Lake Ontario **Ordnance Works Asbestos**  
**Abatement**

**RESPONSE TO FINDINGS:**

1) Contractors from EPS were observed to be pressure washing the second floor of building 6-01, while other employees performed glove-bag operations on existing pipe runs, ACM, friable and non-friable, was present throughout the building, on the floor, piping and some equipment.

Pressure washing operations were performed on the enclosed north section, west wing of building 6-01 immediately after approximately 10 linear feet of ACM piping was removed. Glove-bag operations were performed on remaining pipe runs throughout west section of building 6-01. Stacks of transite panels were mechanically loaded out. Miscellaneous piles of ACM debris were removed (wetted down, bagged out, & HEPA vacuumed) from the floor. Upon completion of these activities, the floor of the west section was then washed down. No pressure washing activities occurred on the second floor of the east section, only glove-bagging of pipe runs. The only equipment where ACM was present were the two hoppers. Containment tents were constructed around each hopper. Tents were put under negative air and abatement performed.

2) Building 6-01 is not enclosed allowing wind to blow through disturbing the friable ACM.

Enclosure of the building was not required.

3) Water used for pressure washing of building 6-01 is not being collected or filtered. Water is draining from the building and onto the ground, saturating the soil and migrating down hill outside the identified 10 feet soil removal area. This water contains asbestos particles.

Water used for pressure washing of building 6-01 was being collected. Some water may have drained onto the ground outside of the building. The quantity of water was not enough to saturate the soil and migrate down hill outside the 10 feet soil removal area. If the water contained asbestos particles, the soil will act as a filter media and the particles will be deposited in the first three inches of soil. Soil extended 10 feet around the perimeter of the building will be excavated and removed at the conclusion of abatement cleanup operations in building 6-01.

4) Equipment from the building is not moved to first floor for wiping and/or washing. Equipment washed in place. No laydown area has been established.

**Moveable** equipment from the second floor west section was removed and placed on the first floor prior to operations. However, certain items/equipment were not removed to the first floor due to the size of the items. To remove the items left in place, structural components of the building would have had to been removed and items removed with minimum of a 25 ton Crane. **Laydown area** was not needed at the time of site visit. **Equipment decon** and **laydown area** constructed as of 9/23/98.

5) Bags of asbestos containing mortar not placed in drums during pressure washing of second floor, Mortar covered with polyethylene and stored on first floor.

According to **ACRES** Asbestos Survey Report, bags of mortar were sampled (Sample Nos. 1-001 A, 1-001B, & 1-001C) and samples were non detect for asbestos. Bags of mortar were located on the first floor east section of building 6-01, pressure washing activities occurred on the enclosed north section of the second floor west section. Bags of mortar were never in contact with pressure washing activities. At the discretion of US ACE Representatives, bags of mortar were covered with two layers of 6-mil polyethylene sheeting until removal operations would commence in east section of building. On 9/21/98, bags of mortar were wetted down, re-bagged, and double bagged out of building.

6) Metal shelving, beams, and other- miscellaneous metal located in building 6-01 and marked to be kept by the Somerset Group, haphazardly thrown into big piles on the ground outside of building 6-01 without being covered or cleaned.

All items located in building 6-01 are still located in building 6-01. The staged piles of scrap metal that is being referred to were already placed there prior to our arrival. Scrap metal piles were discovered during clearing and grubbing operations. Scrap metal will be cleaned and staged adjacent to work area once operations commence in those areas. Initially all scrap metal was to be disposed of by the contractor, upon site arrival it was discovered that the property owner wanted all scrap metal. To repeat, no items removed from building 6-01 and staged haphazardly outside of building.

7) Dust control measures were not in place. Soil containing visible, friable ACM, (i.e. crushed transite panels) observed blowing around the site. No perimeter air monitoring being performed. Air monitoring is being conducted on personnel and in courtyard.

Dust control measures were in place, all ACM materials in designated and demarcated work areas were being removed using wet methods. No soil removal operations were occurring at this point in the project. Soil excavation/removal operations commenced on 9/17/98, water truck on-site as a means of dust control. Excavation areas and haul roads wetted down to control dust emissions. Crushed or broken transite panels are not considered friable, for transite panels to become friable, panels would have to be grinded, sanded, or drilled into. Observed friable ACM blowing around the site is virtually impossible and not representative of site operations. First and foremost, we have collected over 300 representative samples throughout the property and work areas, all samples have resulted in levels at or below the limit of detection. Three samples have been detected above background (0.01f/cc), those samples were collected during abatement operations

inside of fl containment tent. ACM fibers are invisible to the naked eye. All air monitoring conducted in accordance with New York Industrial Code Rule 56. Perimeter/area air monitoring conducted in phases; backgrounds, pre-abatement (preps), environmental, and clearance. Perimeter air monitoring conducted in areas where operations were being performed, if no operations were being performed in a particular area, no air monitoring was required.

8) Decontamination area for equipment being used in areas where contact with friable ACM has not been established.

Further clarification needed, equipment decontamination area was not established at this time.

9) Equipment not maintained in one certain area or cleaned before being moved around the site and through areas that were not identified for soil removal, Equipment (i.e. forklifts), used inside of building 6-01 observed to be tracking ACM from inside the building to areas 150 feet west of the building to the roll off locations disposing of collected transite panels. This same equipment also noticed to be tracking ACM to other locations around the outside perimeter of building 6-01 that had not been identified for soil removal, Track hoe observed moving from these areas and down a paved road leaving dirt containing ACM without cleaning it up or wetting the road.

As of 9/10/98 equipment (i.e. forklifts) will be deconned prior to removal from work areas. Friable ACM pipe insulation was removed from the pathways of the forklifts prior to transite panel removal operations. Friable ACM insulation will not adhere to the wheels of the forklifts, therefore, tracking of ACM to other locations was not feasible. An equipment decontamination facility to be constructed at the conclusion of site operations. Equipment wiped down prior to leaving established work areas. Work areas are in close proximity that plywood covered with reinforced poly sheeting are used to cover road ways during the transportation of equipment to other work areas to prevent cross contamination.

10) Several areas throughout the site with suspect ACM, (i.e. jackets), along with ACM transite panels and other debris that, per contractor, were not identified as areas that need to be evaluated or cleaned up. The contractor stated that they bid and were awarded the contract on the 90% design, which did not address some of these areas.

During site operations additional areas of ACM contamination were discovered. These areas were addressed to USACE Representatives per contract Section 0 1010. A change order is in the process of being established to include these additional areas,

11) Care should be taken to prevent unnecessary exposure to employees and the environment from asbestos fibers that could become airborne during abatement procedures. Inspection of employees should be done at the beginning of each workday to ensure that they are free of hair that will interfere with the donning of the respirator.

Personnel air monitoring is conducted on a daily basis, personnel have not and will not be exposed to elevated levels of asbestos concentrations. On 9/10/98, site personnel were informed to be

clean shaven, Site personnel will be given three separate warnings; (1) verbal reprimand, (2) written reprimand, and (3) removal from site. Personnel **not clean** shaven will be required to shave prior to donning a respirator or given the option of not **working**. **Personnel observed** during the site visit had a day to **two** day growth of **facial** hair and a goatee. **In** my experience and opinion, facial hair **was** borderline and employee was still able to get a good fit. **On 9/11/98** employee was clean **shaven**; neck, face, and head. Workers are inspected and informed **daily** of site protocol **during** safety meetings.

If there are any questions concerning **this** Response to Findings of Staff Visit, please **contact the** undersigned at (716) **754-0952**.

ENVIRONMENTAL QUALITY MANAGEMENT, INC.



Brian Spears, CHMM  
QC System Manager/Site Safety Officer

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